

FILED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

United States of America

vs.
State of Texas, et al.

Case No.: 5:21CV844 (lead case)

JAN 3 - 2022
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Mark F. (Thor) Hearne, II, applicant herein, and

moves this Court to grant admission to the United States District Court for the Western District of

Texas pro hac vice to represent Amicus John R. Ashcroft, Mo Sec'y of State in this case, and

would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of) True North Law, LLC with offices at:

Mailing address: 112 S. Hanley Road, Suite 200

City, State, Zip Code: St. Louis, MO 63105

Telephone: (314) 296-4000 Facsimile: (314) 296-4001

2. Since April 29, 1988, Applicant has been and presently is a member of and in good standing with the Bar of the State of Missouri.
Applicant's bar license number is 37707.

3. Applicant has been admitted to practice before the following courts:

Court:

Supreme Court of Michigan

Admission date:

March 20, 1987

DC Court of Appeals

May 10, 2013

U.S. Supreme Court

May 28, 1996

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):
n/a

5. I have have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: _____ on the ____ day of _____, ____.

Number: _____ on the ____ day of _____, ____.

Number: _____ on the ____ day of _____, ____.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:
n/a

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):
n/a

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: _____

Mailing address: _____

City, State, Zip Code: _____

Telephone: _____

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of
Mark F. (Thor) Hearne, II _____ to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Mark F. (Thor) Hearne, II

[printed name of Applicant]

[signature of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 21st day of December, 2021.

Mark F. (Thor) Hearne, II

[printed name of Applicant]

[signature of Applicant]